

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC.,  
formerly known as  
HELLER HEALTHCARE FINANCE, INC.)

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA.)

Defendant.)

Civil Action No. 05-11128-NG

**ASSENTED TO MOTION FOR ENLARGEMENT OF TIME IN WHICH TO  
MOVE, RESPOND, OR OTHERWISE PLEAD TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendant National Union Fire Insurance Company of Pittsburgh, P.A. ("National Union"), moves this Court for an order enlarging the time within which it may move, respond or otherwise plead to the Complaint to and including August 3, 2005. In support of this assented to motion, National Union states:

1. On May 31, 2005, the plaintiff, GE HFS Holdings, Inc., formerly known as Heller Healthcare Finance, Inc. ("Plaintiff"), filed its Complaint.

2. National Union seeks to enlarge the time within which it may move, respond or otherwise plead to the Complaint in order to complete its investigation of the allegations in the Complaint and fully address the claims set forth therein.

3. On July 29, 2005, counsel for National Union spoke with Jeffrey E. Francis, counsel for Plaintiff, and Attorney Francis consented to this motion for

enlargement of time to move, respond, or otherwise plead to the Complaint to and including August 3, 2005.

4. The Court allowed a previous Assented to Motion for Enlargement of Time in Which to Move, Respond, or Otherwise Plead to the Complaint to July 29, 2005.

5. Neither party will be prejudiced by the brief additional enlargement of time sought by this motion.

WHEREFORE, National Union moves this Court for leave to enlarge time within which it may move, respond or otherwise plead to the Complaint to and including August 3, 2005.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: July 29, 2005

/s/ Mary Patricia Cormier  
John D. Hughes (BBO# 243660)  
Mary Patricia Cormier (BBO# 635756)  
EDWARDS & ANGELL, LLP  
101 Federal Street  
Boston, MA 02110-1800  
Tel: (617) 439-4444  
Fax: (617) 439-4170

CERTIFICATE OF SERVICE

I, Mary Patricia Cormier, hereby certify that on this 29th day of July, 2005, I served a copy of the foregoing document via first class mail, postage prepaid to Gayle P. Ehrlich and Jeffrey E. Francis, Sullivan & Worcester LLP, One Post Office Square, Boston, MA 02109.

/s/ Mary Patricia Cormier  
Mary Patricia Cormier

RULE 7.1 CERTIFICATE

I, Mary Patricia Cormier, hereby certify that on the 29th day of July, 2005, I conferred with Jeffrey Francis, counsel for Plaintiff, who assented to this Motion.

/s/ Mary Patricia Cormier

Mary Patricia Cormier